

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

BRENDA PARRISH, Individually, and as
Administratrix of the Estate of KYLE J.
PARRISH,

Plaintiff,

v.

MEDTRONIC USA, INC., ET AL.,

Defendants.

CASE NO. 1:19-cv-02995

JUDGE JAMES S. GWIN

**DEFENDANTS' UNOPPOSED MOTION TO EXTEND DEADLINE TO ANSWER,
MOVE, OR OTHERWISE PLEAD**

Defendants Medtronic USA, Inc., Medtronic, Inc., and HeartWare International Inc. (collectively, “Defendants”), respectfully move this Court for a two-week extension of time, until and including January 20, 2020, in which to answer, move, or otherwise plead in response to plaintiff’s Complaint.¹ Plaintiff Brenda Parrish, individually and as administratrix of the Estate of Kyle J. Parrish, filed her Complaint in the Cuyahoga County Court of Common Pleas on November 26, 2019. (*See* Doc. 1-1.) 2. On or about December 4, 2019, plaintiff effected service of the Complaint upon Defendants via process server. Defendants timely removed this lawsuit on December 30, 2019, to the United States District Court for the Northern District of Ohio. (*See* Doc. 1.) Defendants’ responsive pleading is currently due on January 6, 2020.

Defendants respectfully request a two-week extension of time in which to answer, move, or otherwise plead in response to plaintiff’s Complaint. The extension is necessary to allow Defendants to thoroughly review and analyze plaintiff’s Complaint, which asserts wrongful death

¹ Defendants respectfully request expedited consideration of their request in order to know the responsive pleading deadline before January 6, 2019.

and product liability claims on behalf of Mr. Parrish, and to prepare a response thereto. Defendants state that they have not previously requested an extension, and that the requested extension will not delay the administration of justice or prejudice any party. Counsel for Defendants has consulted with counsel for plaintiff, who does not oppose this requested two-week extension.

Accordingly, for good cause shown, Defendants respectfully request an extension of time until and including January 20, 2020, to answer, move or otherwise plead in response to plaintiff's Complaint.

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Attorneys for Defendants Medtronic USA, Inc., Medtronic, Inc., and HeartWare International Inc.

CERTIFICATE OF SERVICE

I hereby certify that on January 2, 2020, the foregoing document was filed electronically.

Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

Parties may access this filing through the Court's system.

/s/ Paul J. Cosgrove

*One of the Attorneys for Defendants Medtronic
USA, Inc., Medtronic, Inc., and HeartWare
International Inc.*